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February 16, 2025

VIA ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Trooper 1 v. NYSP et al.*, 22-cv-893 (LDH) (TAM)

Dear Judge Merkl:

We represent former Governor Andrew M. Cuomo and write to supplement the record with new information relevant to Lindsey Boylan's objections to Governor Cuomo's Rule 45 subpoena for her deposition. T1 ECF No. 305. As we noted in response, there are ample reasons to discredit Ms. Boylan's claims that [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]. ECF Nos. 305-1, 305-2.

Belying Ms. Boylan's claims of [REDACTED]
[REDACTED], Ms. Boylan continues to actively engage on social media about this very topic. Indeed, over the past 48 hours, Ms. Boylan has publicly posted dozens of times about Governor Cuomo. And she has responded to, and reposted, others' posts relating to Governor Cuomo. Examples from her more than two-dozen posts over this weekend are attached.

This new information supports what we argued in our opposition: [REDACTED]
[REDACTED]
[REDACTED], Ms. Boylan plainly has no problem addressing and actively engaging others on the topic of Governor Cuomo (who she repeatedly and defamatorily refers to in social media posts as her "abuser"). In fact, Ms. Boylan has threatened to become even more vocal:¹

¹ Ms. Boylan made this post on her publicly accessible Blue Sky account on February 15, 2025. See @lindseyboylan.bsky.social, Blue Sky (Feb. 15, 2025), <https://bsky.app/profile/lindseyboylan.bsky.social/post/3liat7tvspk2k>.

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If Ms. Boylan is able to “work” even harder to publicly weigh in on political issues of the moment, to attack Governor Cuomo publicly, and to attack others whom she views as assisting Governor Cuomo, she is certainly able to sit for a one-day deposition in a law firm conference room and answer questions under oath about her allegations, about her communications with others, and about her witness intimidation conduct. At a minimum, Governor Cuomo should have an opportunity to *voir dire* Ms. Boylan’s [REDACTED].

Respectfully submitted,

/s/ Rita M. Glavin

Rita M. Glavin

Attachment